L. Miles LeBaron (#8982) Melinda Checketts Hibbert (#0698) LeBaron & Jensen, P.C. 1513 North Hill Field Rd, Suite 1 Layton, Utah 84041

Telephone: (801) 773-9488 Facsimile: (801) 773-9489

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH NORTHERN DIVISION

MARIA CALZADA and MANUELA ROSALES on behalf of the ESTATE OF JOSE CALZADA,

Plaintiffs,

v.

ROY CITY, et al.,

Defendants.

NOTICE OF ISSUANCE OF SUBPOENA DUCES TECUM

Civil No. 1:16-CV-165

Honorable David Nuffer

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. Pro. 45, Plaintiffs, by and through their counsel of record, will issue a Subpoena Duces Tecum (for production of documents) (the Subpoena), in connection with the above-captioned matter in the form of that attached hereto as Exhibit "A" to be served on February 13, 2019 on Boart Longyear who has agreed to accept service of the Subpoena via email at simon.cantarero@boartlongyear.com.

DATED this 13th day of February, 2019.

LeBaron & Jensen, P.C. /s/ Melinda Checketts Hibbert L. Miles LeBaron Melinda Checketts Hibbert Attorneys for Plaintiffs

CERTIFICATE OF MAILING

I hereby certify that on February 13, 2019, I served a true and correct copy of the foregoing document **NOTICE OF ISSUANCE OF SUBPOENA DUCES TECUM** (for **production of documents**) using the court e-filling system to the following:

Frank D. Mylar MYLAR LAW, P.C. Mylar-law@comcast.net 2494 Bengal Blvd. Salt Lake City, Utah 84121

DATED this 13th day of February, 2019.

/s/ JaNae	Brooks	
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EXHIBIT A

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

United States Dis	TRICT COURT
for the	. D
District of Utal	
The Estate of Jose Calzada, et al.	
Plaintiff)	Civil Action No. 1:16-CV-165
Roy City, Weber County, et al.	
Defendant)	
SUBPOENA TO PRODUCE DOCUMENTS. OR TO PERMIT INSPECTION OF PRE	
To: Boart Long	year
(Name of person to whom this	s subpoena is directed)
Production: YOU ARE COMMANDED to produce at the documents, electronically stored information, or objects, and to permaterial: Please see Attachment A.	
Place: Law Office of LeBaron & Jensen, P.C. 1513 N. Hill Field Rd. Sto 1. Layton, Utah 84041	Date and Time:
1513 N. Hill Field Rd., Ste 1, Layton, Utah 84041	02/25/2019 9:00 am
☐ Inspection of Premises: YOU ARE COMMANDED to p other property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the prop	d location set forth below, so that the requesting party
Place:	Date and Time:
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date:02/13/2019	poena; and Rule 45(e) and (g), relating to your duty to
CLERK OF COURT Signature of Clerk or Deputy Clerk	OR Melinda C. Helilest Attorney's signature
The name, address, e-mail address, and telephone number of the a	ttorney representing (name of party) Plaintiff, The Estate
of Jose Calzada, by its personal co-representatives	, who issues or requests this subpoena, are:
Melinda Checketts Hibbert and L. Miles LeBaron of LeBaron & Jen 84041; melinda@lebaroniensen.com and miles@lebaroniensen.com	

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:16-CV-165

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(date)	·			
☐ I served the su	☐ I served the subpoena by delivering a copy to the named person as follows:			
		on (date)	or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w		States, or one of its officers or agents, I e, and the mileage allowed by law, in the		
\$	·			
fees are \$	for travel and \$	for services, for a total of \$	0.00	
I declare under po	enalty of perjury that this information i	s true.		
2:		Server's signature		
		Printed name and title		
		Server's address		

Additional information regarding attempted service, etc.:

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT A

ATTACHMENT A

- 1. Please produce all documents and records relating to or referring to wages earned by Jose Calzada, DOB: 05/01/1979, SSN: 615-09-3347 (hereinafter, Mr. Calzada) while employed by Boart Longyear Company or any of its affiliated companies (collectively, Boart Longyear) from the commencement of his employment with Boart Longyear in or about 2007 or 2008 through the termination of his employment with Boart Longyear on or about October 21, 2014, including, but not limited to pay checks, pay stubs, W-2 forms, bonuses, etc. (For your reference and convenience, a copy of 2013 and 2014 W-2 forms and a copy of a paystub from May 2013 issued by Boart Longyear to Mr. Calzada are attached.)
- 2. Please produce all documents and records relating to or referring to compensation or employee benefits, in addition to wages, received by Mr. Calzada at any time while he was employed by Boart Longyear or relating to or referring to compensation or employee benefit to which Mr. Calzada would have been entitled to receive upon retirement, including but not limited to documents relating to or referring to pension plans and future payments, retirement plans and future payments, health and or life insurance plans, etc.
- 3. Please produce all documents and records relating to, referring to and/or constituting job descriptions of positions held by Mr. Calzada while he was employed by Boart Longyear from the commencement of his employment through the termination of his employment with Boart Longyear on or about October 21, 2014, and all records relating to, referring to the dates that Mr. Calzada held each position while he was employed by Boart Longyear.

Case 1:16-cv-00165-DN-EJF Document 50 Filed 02/13/19 Page 9 of 11

Case	±.10-07-00103-DI
Safe, accurate,	2 Visit the IRS Web Site
FAST! Use	at www.lrs.gov/efile
	eference Copy
W-2 Statemen	2013
Copy 2 to be filed with employee's Sta d Control number Dept.	oMB No. 1545-0008
006807 CHIC/LVP 003120	[1]
c Employer's name, address,	
BOART LONGY 2640 WEST 17	00 SOUTH
SALT LAKE C	TY UT 84104
	Batch #04218
eff Employee's name, address,	and ZIP code
JOSE M CALZADA PO BOX 1459	
WINNEMUCCA NV 8	9446
Employer's FED ID number	a Employee's SSA number
87-0503343 1 Wages, tips, other comp.	615-09-3347 2 Federal income tax withheld
77206.70	10197.08
3 Social security wages 79923.59	4 Social security tax withheld 4955.26
5 Medicare wages and tips	6 Medicare tax withheld
79923.59 7 Social security tips	B Allocated tips
9	10 Dependent care benefits
11 Nongualified plans	12a Sec instructions for box 12
4	DI 1963.22 12b AAI 145.74
14 Other	12c 12d
	13 Stat emp Ret. plan 3rd party sick pay
15 State Employer's state ID no	
UT 11977489003WTH	58428.90 18 Local wages, tips, etc.
2843.69 19 Local Income tax	20 Locality name
Wages, tips, other comp.	2 Federal Income tax withheld
77206.70	10197.08
Social security wages 79923.59	4 Social security tax withheld 4955.26
Medicare wages and tips 79923.59	6 Medicare tax withheld 1158.89
Control number Dept.	Corp. Employer use only
06807 CHIC/LVP 003120 Employer's name, address, a	A 309
BOART LONGY 2640 WEST 170 SALT LAKE CIT	EAR
Employer's FED ID number	a Employee's SSA number
87-0503343 Social security tips	615-09-3347 8 Allocated tips
	10 Dependent care benefits
	-
	12a See Instructions for box 12 D 1963.22
	12b AA 145.74
	12d
	13 Stat emp. Ret. plan 3rd party sick pay
M Employee's name, address an OSE M CALZADA PO BOX 1459 VINNEMUCCA NV 89	d ZIP code
5 State Employer's state ID no. UT 11977489003WTH	16 State wages, tips, etc. 58428.90
	18 Local wages, tips, etc.
	20 Locality name
2 Local income tax	
UT,State Filir	ng Copy

2013 W-2 and EARNINGS SUMMARY

This blue Earnings Summary section is included with your W-2 to help describe portions in more det The reverse side includes general information that you may also find helpful.

1. The following information reflects your final 2013 pay stub plus any adjustments submitted by your employe

Gross Pay 78246.96 Social Security 4955.26 UT. State Income Tax 2843 69 Tax Withheld Box 17 of W-2 Box 4 of W-2 SUI/SDI Box 14 of W-2 Fed. Income Medicare Tax 10197.08 1158.89 Tax Withheld Withheld Box 2 of W-2 Box 6 of W-2

2. Your Gross Pay was adjusted as follows to produce your W-2 Statement.

Gross Pay 78 246 96 Less Misc. Non Taxable Comp. 14,420.00 Less 401(k) (D-Box 12) 1,963,22 Less Medical FSA 1,375.08 Less Other Cafe 125 2,059.76 Reported W-2 Wages 58,428,90

Note - Fringe benefits include: Group Legal Service \$110.49

3. Employee W-4 Profile. To change your Employee W-4 Profile Information, file a new W-4 with your payroll dept

JOSE M CALZADA PO BOX 1459 WINNEMUCCA NV 89446

Social Security Number: 615-09-3347 Taxable Marital Status: MARRIED

Exemptions/Allowances:

FEDERAL: 3

UT. State Wages, Tips, Etc. Box 16 of W-2

DD 2013 ADP, INC.

INTENTIONALL LEFT BLANK

CALZADA 000015

Safe, accurate, as 2 file at www.irs.gov/efile Employee Reference Copy Wage and Tax Statement Copy Copy Cferemployee are preceds. d Control number Deg. Corp. Employer use enly 006807 CHIC/LVP 003120

Employer's name, address, and ZIP code
BOART LONGYEAR COMPANY
2640 WEST 1700 SOUTH
SALT LAKE CITY UT 84104

Batch #03574

ell Employee's name, address, and ZIP code

JOSE M CALZADA 3779 W 5300 S ROY UT 84067

b	Emple	87-0503343	a Employee's SSA number 615-09-3347		
1	Wage	s, tips, other comp. 48527.66	2 Federal Income tax withheld 7462.66		
3	Socia	security wages 49129.28	4 Social security tax withheld 3046.02		
5	Medic	are wages and tips 49129.28	6 Medicare tax withheld 712.37		
7	Social	security tips	8 Allocated tips		
9			10 Dependent care benefits		
11	Nonqu	alified plans	12a See instructions for box 12 D 601.62		
14 Other			12b AAI 291,16 12c DDI 8772,72 12d I		
15	State	Employer's state ID no	13 Statemp Ret. plan 3rd party sick party si		
,.		TOTAL STATE	The case wages, ups, ste.		
17	State	1620.84	18 Local wages, tips, etc.		
19 Local income tax		income tax	20 Locality name		

2014 W-2 and EARNINGS SUMMARY



This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

1. The following information reflects your final 2014 pay stub plus any adjustments submitted by your employer

	Tenedia	your final 2014 pi	ny stub pius any	adjustments submit	ted by your er	nployer.
Gross Pay	55433.80	Social Security Tax Withheld Box 4 of W-2	3046.02	UT. State Income 1 Box 17 of W-2 SUI/SDI	Tax	771.86
Fed. Income Tax Withheld Box 2 of W-2		Medicare Tax Withheld Box 6 of W-2	712.37	Box 14 of W-2		*

2. Your Gross Pay was adjusted as follows to produce your W-2 Statement.

	Wages, Tips, other Compensation Box 1 of W-2	Social Security Wages Box 3 of W-2	Medicare Wages Box 5 of W-2	UT. State Wages, Tips, Etc. Box 16 of W-2
Gross Pay	55,433.80	55,433.80	55,433.80	19,573.47
LOSS Misc. Non Taxable Comp.	3,375.00	3,375.00	3,375.00	630.00
Less 401(k) (D-Box 12)	601.62	N/A	N/A	411.73
Less Other Cafe 125 Reported W-2 Wages	2,929.52 48,527.66	2,929.52 49,129.28	2,929.52 49,129.28	1,357.09 17,174.65

Note - Fringe benefits include : Group Legal Service \$137.16

3. Employee W-4 Profile. To change your Employee W-4 Profile Information, file a new W-4 with your payroll dept.

JOSE M CALZADA 3779 W 5300 S ROY UT 84067

Social Security Number: 615-09-3347 Taxable Marital Status: SINGLE

Federal Income tax withheld

4 Social security tax withheld 3046.02 6 Medicare tax withheld

7462.66

712.37

Exemptions/Allowances:

FEDERAL: 1 STATE: 1

48527.66

Wages, tips, other comp

Social security wages 49129.28

© 2014 ADP, LLC

48527.66	2 Federal Income tax withheld 7462.66
3 Social security wages	4 Social security tax withheld
49129.28	3046.02
Medicare wages and tips	6 Medicare tax withheld
49129.28	712.37
d Control number Dept 006807 CHIC/LVP 0031	224

BOART LONGYEAR COMPANY 2640 WEST 1700 SOUTH SALT LAKE CITY UT 84104

b Employer's FED ID 87-050334	ember a Employee's SSA number 615-09-3347
7 Social security tips	8 Allocated tips
9	10 Dependent care benefits
11 Nonqualified plans	12a See instructions for box 12 D1 601.62
14 Other	12b AAI 291.16
	12c DD _i 8772.72
	12d
	13 Stat emp Ret. plan 3rd party sick pa

JOSE M CALZADA 3779 W 5300 S ROY UT 84067

elf Employee's name, address and ZIP code

15	State	TOTAL STATE	16 State wages, tips, etc.
17	State	income tax 1620.84	18 Local wages, tips, etc.
19	Local	income tax	20 Locality name

Federal Filing Copy
Wage and Tax 2014
Statement
Copy B to be filed with exployee's Federal Income Tax Return.

1 Wages, tips, other of 485.	2 Federa	I income ta	x withheld 7462.66	
3 Social security wages 49129.28		4 Social security tax withheld 3046.02		
5 Medicare wages and tips 49129.28		6 Medica	re tax with	712.37
d Control number Dept. 006807 CHIC/LVP 003120		200000000000000000000000000000000000000	use only 173	
	ONGYE	AR C	OMPANY	

		13 Stat emp Ret. plan 3rd party sick pay
		12d
		12c DD ₁ 8772.72
14 Other		12b AA 200.21
11	Nonqualified plans	12a D 411.73
9		10 Dependent care benefits
7	Social security tips	8 Allocated tips
ь	Employer's FED ID number 87-0503343	a Employee's SSA number 615-09-3347

JOSE M CALZADA

3779 W 5300 S ROY UT 84067

15 State	Employer's state ID no. 11977489003WTH	16 State wages, tips, etc. 17174.65		
		18 Local wages, tips, etc.		
19 Local	Income tax	20 Locality name		
	UT.State Re	ference Copy		

W=2 Wage and Tax
Statement
Copy 2 to be filed with employee state Income Tax
Ref

	pt. Corp. Employer use only		
006807 CHIC/LVP 0031			
b Employer's FED ID numbe 87-0503343	a Employee's SSA number 615-09-3347		
7 Social security tips	8 Allocated tips		
9	10 Dependent care benefits		
11 Nonqualified plans	12a D 411.73		
14 Other	12b AA 200.21		
	12c DD 8772.72		
	12d		
	13 Stat emp Ret. plan 3rd party sick p		
e/l Employee's name, address JOSE M CALZADA 3779 W 5300 S	and Lir code		
ROY UT 84067	no. 16 State wages, tips, etc.		
ROY UT 84067 15 State Employer's state ID 1 17 11977489003WT	H 17174.65		
ROY UT 84067	no. 16 State wages, tips, etc. 17174.65 18 Local wages, tips, etc. 20 Locality name		

Period Beginning:

05/06/2013 05/12/2013

Period Ending: Pay Date:

05/17/2013

00000000480

JOSE M CALZADA 3779 W 5300 S **ROY UT 84067**

Earnings Statement

Taxable Marital Status: Married Exemptions/Allowances: Federal: 3 UT: 3

Social Security Number: XXX-XX-3347

Earnings	rate hours this period	year to date
Regular	23.5100 8.50 199.84	12,726.54
Blend Ot 1.5		10,597.47
Float Holiday		181.28
Hol Earn Cogs		543.84
Nontxbl-Pdiem		4,560.00
Product Bonus		807.56
Shift		12.50
Vac Earn Ofc		883.74
	Gross Pay \$199.84	30,312.93

		007.50
		12.50
		883.74
Gross Pay	30,312.93	
Statutory		
Social Security Tax	-2.56	1,468.87
Medicare Tax	-0.60	343.53
Federal Income Tax		2,516.14
LIT OL L T		

rederal income rax	2,510.14		
UT State Income Tax		983.56	
Other			
Dental Pretax	-6.90*	89.70	
Medical Fsa	-63.46*	825.04	
Medical Pretax	-87.31*	1,135.09	
Met Life Legal	-3.81	72.39	
Roth 401K	-2.00	2.00	
Vision	-0.90*	11.70	
401K Ded	-11.99*	1,816.05	
401K Loan Paymt	-20.31	3,025.59	
Ad&D Ins	N (//	118.13	
Life Ins		80.98	

	. 2	1 3	126	
Net Pay			\$D	.00
	1	"Oust	24.7	

* Excluded from federal taxable wages Your federal taxable wages this period are \$29.28

Other Benefits and Information	this period	total to date
Er Dental Cost	22.17	288.21
Er Medical Cost	204.19	2,654.53
401K Elig Earns	199.84	25,752.93
401K Er Match	6.00	683.38
Vac Anniv. Date		10/22/2007
Vacation Balnce		0.00
Deductions in Arrea	irs	Balance
	and the state of the state of the state of	100

Ad&D Ins	16.95
Dental Pretax	2.30
Er Dental Cost	7.39
Er Medical Cost	68.07
Er Vision Cost	0.87
Life Ins	11.70
Life Ins-Spouse	2.80
Medical Fsa	21.16
Medical Pretax	29.11

Vision 401K Loan Paymt

> 29.11 0.30 313.61

ENT AUTHENTICITY - COLORED AREA MUST CHANGE IN TONE GRADUALLY AND EVENLY FROM DARK AT TOP TO LIGHTER AT BOTTOM

19.60

BOART LONGYEAR 2640 WEST 1700 SOUTH SALT LAKE CITY, UT 84104

Life Ins-Spouse

Advice number: Pay date:

00000200494 05/17/2013

Deposited to the account of JOSE M CALZADA

PMorgan Chase Bank

Deductions

VOID AFTER 180 DAYS

THE ORIGINAL DOBUMENT HAS AN ARTISIGIAL WATERMARK ON THE BACK HOLD AT AN ANGLE OF VIEW WITH THE

NON-NEGOTIAB